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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ROTHSCHILDS CONTINUATION HOLDINGS AG, :
ROTHSCHILD NORTH AMERICA INC., :
ROTHSCHILD INC., and ROTHSCHILD ASSET :
MANAGEMENT INC., :

Plaintiffs,

- vs -

JED P. KAPLAN, KAPLAN & CO. SECURITIES
LLC, and LF ROTHSCHILD, LLC,

Defendants.
----- X

07 Civ. 6261 (AKH)

**NOTICE OF MOTION
FOR PRELIMINARY
INJUNCTION AND PROPOSED
ORDER**

To:

Jed P. Kaplan
17729 Middlebrook Way
Boca Raton, Florida 33496

Kaplan & Co. Securities, LLC
150 East Palmetto Park Road
Suite 450
Boca Raton, Florida 33432

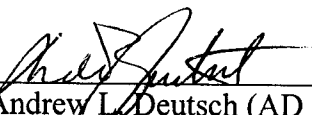
LF Rothschild, LLC
150 East Palmetto Park Road
Suite 450
Boca Raton, Florida 33432

PLEASE TAKE NOTICE that upon the Summons and Complaint, the accompanying Declaration of John Carroll, dated July 10, 2007, and exhibits thereto, the accompanying Plaintiffs' Memorandum of Law In Support of Motions for Preliminary Injunction and Order Granting Expedited Discovery, plaintiffs Rothschilds Continuation Holdings AG, Rothschild North America Inc., Rothschild Inc., and Rothschild Asset Management Inc., by their attorneys DLA Piper US LLP, will move the Court at the United States Courthouse, 500 Pearl Street, New York, New York, on August 10, 2007, or at such other time and date as the Court may designate, for an order, pursuant to Federal Rules of Civil Procedure 65 and 28 U.S.C. § 1657(a), granting the attached Proposed Order, which grants a preliminary injunction against defendants enjoining them, pending trial of this action, from: (a) using directly or indirectly, in any manner whatsoever, the marks L.F. ROTHSCHILD & COMPANY, LF ROTHSCHILD or any other mark or domain name that includes the name or word "Rothschild" or any mark similar in nature thereto; (b) doing any other act or thing calculated or likely to cause confusion or mistake in the trade or the minds of the public, or to deceive actual or potential purchasers into believing that the defendants' services originate with any of the plaintiffs or are approved, licensed, or otherwise authorized by any of the plaintiffs; (c) engaging in any other activity that constitutes unfair competition with respect to plaintiffs; and (d) aiding, abetting or assisting any other person or entity in engaging in or performing any activities stated in paragraphs (a) through (c), and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that any opposing affidavits and answering memoranda of law are to be served upon the undersigned within ten business days after service upon you of these moving papers.

Dated: July 11, 2007

DLA PIPER US LLP

By: 
Andrew L. Deutsch (AD 5782)
1251 Avenue of the Americas
New York, New York 10020
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Attorneys for Plaintiffs